2

3

4

5

6 7

8

9

10

11

12

13

14 15

16

17

18

19

20

21

22

23

24

25 26

27

28

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

SOUTHERN DIVISION

September 2010 Grand Jury

Case No.

[18 U.S.C. §§ 2252A(a)(5)(B), (b)(2): Possession of Child Pornography]

SACR11-0170

INDICTMENT

The Grand Jury charges:

Plaintiff,

Defendant.

UNITED STATES OF AMERICA,

v.

CARLTON NEIL MORSE,

COUNT ONE

[18 U.S.C. §§ 2252A(a)(5)(B), (b)(2)]

On or about January 11, 2011, in Orange County, within the Central District of California, defendant CARLTON NEIL MORSE knowingly possessed a Toshiba Satellite L655-S5071 laptop computer, serial number 6A184863W, that contained at least one image of child pornography, as defined in Title 18, United States

Code, Section 2256(8)(A), that had been shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, knowing that the image was child pornography.

## COUNT TWO

[18 U.S.C. §§ 2252A(a)(5)(B), (b)(2)]

On or about January 11, 2011, in Orange County, within the Central District of California, defendant CARLTON NEIL MORSE knowingly possessed a Seagate Barracuda 80 GB hard-drive, serial number 9LR25V00, that contained at least one image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been shipped and transported using any means. and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, knowing that the image was child pornography.

## COUNT THREE

[18 U.S.C. §§ 2252A(a)(5)(B), (b)(2)]

On or about January 11, 2011, in Orange County, within the Central District of California, defendant CARLTON NEIL MORSE knowingly possessed a Western Digital hard-drive, model WD400, serial number WMAJC28378, that contained at least one image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, knowing that the image was child pornography.

## COUNT FOUR

-10

[18 U.S.C. §§ 2252A(a)(5)(B), (b)(2)]

On or about January 11, 2011, in Orange County, within the Central District of California, defendant CARLTON NEIL MORSE knowingly possessed a Western Digital hard-drive, model WD3200AAJS, serial number WMAV28670472, that contained at least one image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, knowing that the image was child pornography.

A TRUE BILL

/s/

Foreperson

United States Attorney

ANDRÉ BIROTTE JR.

ROBERT E. DUGDALE

ROBERT E) DUGDALE
Assistant United States Attorney
Chief, Criminal Division

DENNISE D. WILLETT
Assistant United States Attorney
Chief, Santa Ana Branch Office

TERRI K. FLYNN Assistant United States Attorney Deputy Chief, Santa Ana Branch Office

ROBERT J. KEENAN Assistant United States Attorney